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October 25, 2001

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: Tariff Transmittal No. 01-66; D.T.E. 01-20; and D.T.E. 98-57

Dear Ms. Cottrell:

Verizon Massachusetts ("Verizon MA") is responding to the October 16, 2001, Comments of RCN-BECOCOM, LLC ("RCN") in opposition to the Company's above tariff filing. RCN is the only carrier that has submitted comments regarding this tariff filing.

RCN's objection is based solely on its argument that Dedicated Transit Service ("DTS") should be made available to two collocators *between* central offices, not solely *within* the same central office. RCN's argument is unfounded for the following reasons.

First, the requirement that DTS apply within the same central office has already been approved by the Department and is part of Verizon MA's currently effective Tariff No. 17 (Part E, Sec. 5.1.1.A). Verizon MA's proposed tariff did not change this requirement but only added to the types of facilities that could be used by CLECs to connect collocation sites within the same office. Therefore, RCN's objections to that requirement are untimely and inappropriate. Moreover, RCN ignores the fact that Verizon MA currently provides CLEC with Unbundled Interoffice Facilities ("IOF") Transport for collocation arrangements between central offices. *See* Tariff No. 17, Part B, Sec. 2. Therefore, RCN's alleged concerns are already addressed, and its claim that Verizon MA's proposed DTS tariff limits the operating flexibility of CLECs is simply wrong.

Second, as stated in the transmittal letter accompanying this tariff filing, Verizon MA's proposed tariff was made to comply with Federal Communications Commission ("FCC") directives in the *Fourth Report and Order* in CC Docket No. 98-147, adopted and released August 8, 2001. That Order addresses the issue of cross-connects *within* a central office and the availability of alternative cross-connect arrangements between two collocated CLECs *within* a central office. Order, at ¶¶58-59. The existing DTS tariff provides only for DS1 cross connections. To comply with the FCC's directives, Verizon MA expanded the types of connections that were available for DTS service. The Company's proposed language in Part E, Section 5.1.1.A states that

DTS is available for voice grade, DS1, DS3/STS-1 and dark fiber cross connects. In addition, the Telephone Company will also provide other technically feasible cross-connection arrangements, including lit fiber, on an individual case basis as requested by a CLEC. The Telephone Company will offer DTS as long as such access is technically feasible.

This complies fully with the FCC's requirements. Moreover, RCN raises no objections regarding this new tariff language. Accordingly, the Department should reject RCN's request to suspend Verizon MA's tariff filing and should approve the Company's tariff changes as filed without further investigation.

Thank you for your assistance in this matter.

Very truly yours,

Barbara Anne Sousa

cc: Michael Isenberg, Esquire, Director - Telecommunications Division
Marcella Hickey, Esquire, Hearing Officer
Tina Chin, Esquire, Hearing Officer
Paula Foley, Esquire, Hearing Officer
Jesse Reyes, Esquire, Hearing Officer
Attached D.T.E. 01-20 & D.T.E. 98-57 Service Lists